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August 5, 2016

Via ECF

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court
District Court of New Jersey
Martin Luther King Building & U.S. Court
50 Walnut Street
Newark, NJ 07101

Re: CGB v. Lucia, Khorozian, et al.
Civil Action No. 2:15-CV-03401-CLW
Our File No. 6054-04

Dear Judge Wettre:

As you may recall, this office represents Defendant Aida St. Lucia in the aforementioned matter. Following the telephonic conference with the Court held yesterday, August 4, 2016, I have now had an opportunity to confer with Ms. St. Lucia regarding the court's instructions. Ms. St. Lucia has confirmed (without waiver of the attorney-client privilege) that she will be seeking medical care in Italy where she has medical insurance coverage and has a scheduled departure date of August 14, 2016. Because Ms. St. Lucia's medical issues are not relevant to the claims asserted in this matter, those issues were not further explored beyond the client's representation that medical care is required. Since Ms. St. Lucia has no medical insurance coverage in Florida where she resides when in the United States, she is unable to provide any doctor's note confirming any medical condition at this time. In accordance with Your Honor's prior order, Ms. St. Lucia has now assured us that she will be back in New Jersey in order to have her deposition conducted in compliance with the court deadline of September 15, 2016. I have advised plaintiff's counsel of this development and requested confirmation to schedule the deposition of Ms. St. Lucia on September 14, 2016. In the interim, we continue to request a date to conduct the deposition of the plaintiff.

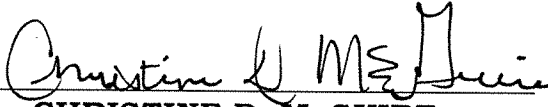
August 5, 2016

Page 2 of 2

I thank the court for your consideration of this matter.

Respectfully yours,

MAYFIELD, TURNER, O'MARA & DONNELLY

BY: 
CHRISTINE D. McGUIRE

CDM/kmd

Cc: Victoria J. Airgood, Esquire